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CALIFORNIA MEDICAL ASSOCIATION
FLORIDA MEDICAL ASSOCIATION
MEDICAL SOCIETY STATE OF NEW YORK
TEXAS MEDICAL ASSOCIATION

October 21, 2020

Don Rucker, MD
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C Street, SW
Washington, DC 20201

Re: 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program Final Rule: Request for Delay of Implementation

Dear Dr. Rucker:

On behalf of the thousands of physicians we represent in four of the largest state medical associations, we are writing to respectfully request that you delay implementation of the information blocking provisions of the 21st Century Cures Act Final Rule for at least one year.

We remain completely committed to the goals of the Final Rule – ensuring that robust health care data is accessible to both clinicians and patients. Leveraging new technology to facilitate that access is a laudable goal that CMA strongly supports.

Currently, however, physician practices are spending their time and effort battling the COVID-19 pandemic. Physicians are also preparing for flu season, as well as a resurgence of the coronavirus. Moreover, physicians are struggling to maintain the financial viability of their practices during the pandemic and do not have the additional resources to dedicate to hiring consultants to develop compliance plans. Asking physicians at this moment to come into compliance with a rule set to take effect on November 2nd is simply too much to ask.

With a one year delay, physicians and all other actors in the system can keep their focus where it belongs – battling COVID-19 and seasonal diseases – while keeping the requirements in place as a goal to work toward.

Thank you in advance for your consideration of this request. We look forward to continuing to work with your office to make data exchange a reality for all physicians.

Sincerely,

California Medical Association
Florida Medical Association
Medical Society State of New York
Texas Medical Association